

ELLIOTT & ELLIOTT, P.A.
ATTORNEYS AT LAW
1508 Lady Street
COLUMBIA, SOUTH CAROLINA 29201
selliott@elliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555
FACSIMILE (803) 771-8010

January 10, 2019

VIA E-FILE

Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

RE: Application Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules
and Charges
Docket No. 2018-319-E

Dear Ms. Boyd:

I have enclosed for filing the Petition to Intervene of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record and requesting that each serve me with all outstanding motions or other pleadings, together with all discovery responses served to date and to be served.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/lbk
Enclosures

cc: All parties of record (w/enc.)

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-319-E

IN THE MATTER OF:)	
)	
Application Duke Energy Carolinas, LLC)	PETITION TO INTERVENE
For Adjustments in Electric Rate Schedules)	
and Charges)	

The South Carolina Energy Users Committee (“SCEUC”) hereby petitions the South Carolina Public Service Commission (“Commission”) pursuant to R.103-836 of the Commission’s rules and regulations to intervene and to be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That on November 8, 2018, Duke Energy Carolinas, LLC (“Duke Energy” or the “Company”) filed an application with the Commission pursuant to S.C. Cod Ann. §§ 58-27-820 and 58-27-870 and 26 S.C. Code Ann. Regs 103-303 and 103-823 seeking, *inter alia*, authority to adjust, change and increase its retail electric rates, charges and tariffs which, according to the application, would increase annual revenues by approximately 10% or \$168 million.

2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.

3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from Duke Energy.

4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.

5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.

6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.

7. That in accordance with Rule R. 103-804 (S) of the Commission's Rules of Practice and Procedure, Petitioner is represented by counsel in this proceeding:

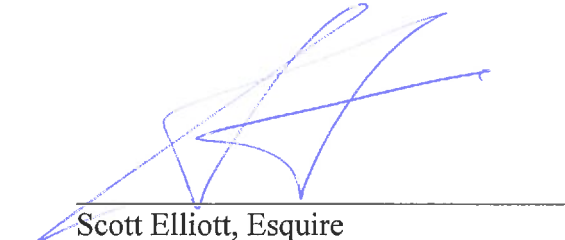


Scott Elliott, Esquire
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, South Carolina 29201
Telephone: 803-771-0555
Fax: 803-771-8010
Email: selliott@elliottlaw.us

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;

- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.



Scott Elliott, Esquire
ELLIOTT & ELLIOTT, P.A.
1508 Lady Street
Columbia, S.C. 29201
(803) 771-0555
selliott@elliottlaw.us

*Attorney for the South Carolina
Energy Users Committee*

Columbia, South Carolina
January 10, 2019

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Application Duke Energy Carolinas, LLC for Adjustments
in Electric Rate Schedules and Charges

DOCKET NO.: 2018-319-E

PARTIES SERVED: VIA ELECTRONIC AND REGULAR MAIL

Jeffrey M. Nelson, Esquire
Steven W. Hamm, Esquire
C. Lessie Hammonds, Esquire
Jenny R. Pittman, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
jnelson@regstaff.sc.gov
shamm@regstaff.sc.gov
lhammon@regstaff.sc.gov
jpittman@regstaff.sc.gov

Heather S. Smith, Esquire
Deputy General Counsel
Duke Energy Carolinas, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
Heather.Smith@duke-energy.com

John Burnett, Esquire
Duke Energy Business Services, LLC
550 South Tyron Street
Charlotte, NC 28202
john.burnett@duke-energy.com

Frank R. Ellerbe, III, Esquire
Robinson Gray Stepp & Laffitte, LLC
Post Office Box 11449
Columbia, SC 29211
fellerbe@robinsongray.com

Molly McIntosh Jagannathan, Esquire
Troutman Sanders LLP
301 South College Street, Suite 3400
Charlotte, NC 28202
molly.jagannathan@troutman.com

Carri Grube-Lybarker, Esquire
Becky Dover, Esquire
SC Department of Consumer Affairs
P.O. Box 5757
Columbia, SC 29250
clybarker@scconsumer.gov
bdover@scconsumer.gov

Richard L. Whitt, Esquire
Austin & Rogers, P.A.
508 Hampton Street, Suite 300
Columbia, SC 29201
rlwhitt@austinrogerspa.com

Alexander G. Shissias, Esquire
The Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201
alex@shissiaslawfirm.com

Bess J DuRant, Esquire
Sowell & DuRant, LLC
1325 Park Street, Suite 100
Columbia, SC 29201
bdurant@sowelldurant.com

Thadeus B Culley, Regional Director
Vote Solar
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

Stephanie U. (Roberts) Eaton, Esquire
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
sroberts@spilmanlaw.com

Derrick Price Williamson, Esquire
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Carrie M. Harris, Esquire
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC
charris@spilmanlaw.com

PLEADING:

PETITION TO INTERVENE BY SOUTH CAROLINA
ENERGY USERS COMMITTEE

January 10, 2019



Linda B. Kitchens, Paralegal
ELLIOTT & ELLIOTT, P.A.
1508 Lady Street
Columbia, SC 29201
linda@elliottlaw.us